

## Docket

SUPERIOR COURT  
STAMFORD-NEWLARK  
JUDICIAL DISTRICT

### Stamford Superior Court

2020 JAN 23 P 4:43

John J. Flynn	(Pro-se Litigator)	
Stephen Barrier	(Pro Se Litigator)	At Stamford
Steven Barrier	(Pro Se litigator)	Date :January 23/2020
Valerie Jaddo	(Pro Se Litigator)	Tues Return Date 2/25/2020

(The 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> plaintiffs seek their own counsel.)

Vs

- 1) The City of Stamford, Chief Executive Office, Mayor Martin
- 2) State of Ct. Medical Examiner M. Hayes 860-679-3980 [m.hayes@ct.gov](mailto:m.hayes@ct.gov)  
[lsylvia@ocme.org](mailto:lsylvia@ocme.org)
- 3) Axon -The TASER Manufacturer- we reached out top axon multiple times and they told us to sue them. Axon denied us the Training manual for law enforcement (At 2:16 on January 23, 2020.)
- 4) STATES Attorney Richard Colangelo. Richard Colangelo has repeatedly threatened Flynn with false arrest and has intimidated the families counsel. The State's Attorney falsified a money laundering investigation for more than 13 years.

The Media has been used to knowingly spread false information.

- A) The Hour- (knowingly reported on Evidence manufactured and edited for the Media).
- B) The Stamford Advocate. (knowingly reported on Evidence manufactured for the Media). Weeks before the autopsy was to be released a falsified Autopsy was sent by M. Hayes' boss Mr. Gill to Richard Colangelo which was circulated saying that no bruising and no tasers were used.

### Complaint.

First Count      Malicious Prosecution.

1. The Plaintiffs, Valerie Jaddo, and Steven Barrier was appointed guardian of her son Stephen Barrier by the Court, and authorized to act in that capacity.
2. On December 13, 2019 The Hour claimed the actions of Richard Colangelo, running for election, and the false comments made to the media have already prejudiced a fair trial in the ongoing Dulos case; Richard Colangelo is feeding the Media a False narrative.
3. Notice of intension to commence an action was filed on January 10, 2020.
4. Steven Barrier, after text messages clearly described, was falsely arrested, committed no crime, was denied medical, was denied due process, was left for dead. After being tasered repeatedly at 1:30 was left for dead.
5. 12/22/19 According to Sean Boeger. who completed the taser log said no tasers was used. Boeger claimed there are three separate investigations pending OCME, State's Attorney, and the City Stamford. [sboeger@stamfordct.gov](mailto:sboeger@stamfordct.gov) The evidence was destroyed. The investigations were falsified.
6. Police are reportedly looking for the Tasers never used.
7. Police refused to return the property of Steven Barrier JR.
8. According to video, Steven Barrier was tasered to death and the evidence was manipulated and criminally concealed in a coordinated effort. False statements were made and the identities of the 5<sup>th</sup> and 6<sup>th</sup> officers were criminally concealed. Police reports were denied multiple times to the State Advocate and Flynn. Statements being withheld were falsified.
9. Reportedly Narcan was administered twice to a youth that had no opioids in his system.
10. On December 22, 2019 Plaintiff Flynn tried to report the murder, after viewing a video and was assaulted at the police station.
11. On the day of the murder, police stood idly by and mocked the young man, who had his forehead removed. Bruising was reported and taser marks in the back of his head, temples neck back and legs.
12. Flynn has repeatedly been threatened by Richard Colangelo with false arrest. Colangelo falsified a \$47-million -dollar securities fraud case since September 30 ,2000. Flynn had 1228 stolen checks cashed. Million s of shares of stock were stolen. FST cv 14 5014296-s. Francis Devanny and Detective Maloney committed perjury and denied any knowledge of the investigation containing 900 pages of logged evidence. The case was mishandled by more than 9 Stamford and Norwalk detectives. Informants were used to threaten Flynn. Detectives claimed to have a file of financial crimes, they had no intention of solving.

Richard Colangelo allowed 10 Bank America Attorneys to claim to be Flynn's Attorney and extorted him. Chief Larrabee of Stamford, along with Judge Povodator (Adams, Jacobs, and Heller) allowed informants to threaten Flynn and denied 911 calls at trial.

13. Police falsified evidence and destroyed over 500 exhibits at trial; Colangelo covered it up.
14. The Defendant, City of Stamford put in place, Policies and Procedures for dually appointed Police to enforce and protect the public. There is a breach of the Public Trust for each Plaintiff, and breaches of the 13<sup>th</sup> and 14 amendments, for due process and equal protection under the law.
15. Prior Council to Valerie Jaddo, on December 13<sup>th</sup> 2019, has stated that she will be unable to proceed with trial and would be forced to settle. leaving her without representation. This is messaging a witness to intimidate, forcing Valerie Barrier to represent herself.
16. Colangelo and others continue to contact the Barriers and Flynn a form of intimidation.
17. The Family was denied a chance to view the body of Steven Barrier on November 14, 2019 Elizabeth Greenwood had an appointment to view the body and was denied.
18. The body cam evidence was staged. The Police created a false video of the pursuit when Steven was already unconscious. Steven was never read his rights.
19. On Tuesday November 19<sup>th</sup>, 2019, Mike Hayes denied the viewing of the body, falsified an autopsy and leaked it. News sources leaked the falsified Autopsy to Flynn.
20. The City refused to allow the Barrier discussion to the Agenda of the Common Counsel meetings.
21. On October 23<sup>rd</sup> Steven Barrier Jr, turned 23 and returned from Boston Market and decided to make coffee, he reached for milk and Shanika attacked Steven. Valerie and her husband were present. Shanika Barrier lied to Police setting up Steven.
22. Mike Jefferson took instruction from Richard Colangelo. Mike Jefferson falsely claimed to have filed criminal charges against The City Stamford.
23. Mike Jefferson (850)-766-1471 on December 21<sup>st</sup>, 2019; told John Flynn that Mike Jefferson never viewed any videos. Valerie gave the video to Mike Jefferson on 12/16/ 2019. Valerie was clear that the video NOT be released. We believe that Richard Colangelo has seen the video. Michael said to Valerie, "This case is not going to get to trial". Mike refused to return her phone calls, upon information and belief, the Attorneys were compromised. Our understanding is that Colangelo pressured Mike Jefferson. It is witness and evidence tampering.

24. Shenika gave her own statement to Police that Valerie does not have. Shenika has a medical condition. We suspect that Shanika was coached to answer questions with Mayor Martin. Each time Shanika was asked a questions, Maurice, Caty , Steve, from Ansonia took notes, the statements and documents were denied to all the Plaintiffs.
25. The Police have refused every document request. The records division Jared and Brandon refused every request.
26. On Wednesday October 23<sup>th</sup>, 2019, via text messages, the Police were informed that Stephen Barrier was home, fine and that there was no need or cause for alarm. It was Steven's 23rd birthday and Steven was lawfully on the premises of his home and safe at 113 West Ave, Stamford, Ct.
27. Upon information and belief, Valerie's daughter, who suffers from pschitophrania was coached into making statements to Police to be used to justify the murder of Stephen barrier, to justify deadly use force and subdue the 23-year old. The Police then leaked to the press that deadly force was never used. Police them falsely claimed to have arrested Stephen barrier, when he was unconscious.
28. On October 23rd, under information and belief, Stephen Barrier was working at Boston Chicken and closed the restaurant on his 23<sup>rd</sup> birthday. Stephen came home and had an argument that he wanted milk in his coffee. His sister quarreled, refused to give him the baby's milk and an argument ensued. Then things were fine.
29. On Friday December 15, 2019; The State Medical Examiner, after the release of the falsified "telephone version" autopsy refused to show the body to Elizabeth Greenwood. The telephone version falsified report stated, "no bruising". Then on December 18 Valerie returned from Jamaica. On Tuesday, December 19, 2019 Mike Jefferson, Valerie's husband, Valerie Jaddo, and Elizabeth Greenwood met with Medical Examiner M. Hayes, who again denied access to Stephen's body, who stated "the report was still pending". Attorney Mike Jefferson said nothing. Pictures were shown to the family showing the bruises only after being confronted, with Plaintiff Flynn on the phone on December 22, 2019, after the funeral M. Hayes said, "the falsified autopsy had to have been leaked". The family was denied being shown the body. The body was quickly buried with the taser marks on the temples, head and neck being shown to the family.
30. The pictures were not produced after hyes said there was no evidence of tasing.
31. On December 4, 2019 George Zimmerman sued Trayvon Martin's Attorney and the State Prosecutor for a false narrative, malicious prosecution, evidence tampering, the falsification of evidence, pressuring of statements, coaxing, coaching and the destruction of the tasing evidence.

32. Upon information and belief, six armed, Police Officers took it upon themselves to surveille and approach 113 West Ave Stamford Ct, without a warrant or probable cause, after being told there was "no emergency". Via text. Those texts are preserved.
33. Police lured Stephen outside on his last birthday, and detained Stephen Barrier, under false pretenses. Stephen Barrier had a history of medical emergencies what is considered crisis prevention. Stephen suffered merely from Depression, a common treatable occurrence. The actions of the first 6 Police on the scene, constituted an illegal search and life-threatening seizure and a 4<sup>th</sup> amendment violation right.
34. Police had established a long-standing history of threatening comments and language that can only be described as "hateful". The Police demonstrated a willingness to leave Stephen for dead. Under ADA law, Stephen was disabled and deserved treatment that constituted and sustained a "quality of life."
35. Valerie Jaddo's First Affidavit dated, 12/13/19, establishes a Timeline.
36. Steven Barrie was tasered at 1:30 on 10/23/19 and pronounced dead at 2:30 on 10/24/19 after his second apprehension. Steven was in their custody for more than one hour.
37. Police arrived and turned off the Body Cam footage at 11:20 pm on 10/23/19. Intentionally, obstructing the production of evidence of the events, intentionally limiting the "preponderance of evidence" to be presented to a jury of Stephen's peers. The buffer mode of the body cams was also intentionally turned off, obstructing and concealing intended actions.
38. The Defendant City of Stamford is liable for repeated tasering, wounding, and bruising his lower extremities, and hereby causing the decedent to sustain and suffer catastrophic personal injury.
39. The 21<sup>st</sup> police officer on the scene turned on the body cam and has staged the deceased running from police, which is impossible, because he was already apprehended and taken into custody.
40. The Defendant, Medical Examiner, M. Hayes caused and leaked a falsified autopsy claiming, "no bruising", On November 15, The medical examiner refused to allow Valerie and Elizabeth Greenwood to view the body and evidence collected.
41. According to Tom, The Stamford Police are required to report if a taser is used. The frequency and duration of each shock is recorded. The Police reported that "No Taser" was used.

42. Valerie witnessed Police searching the property of 113 West Ave Stamford. Reported in Valerie Affidavit called "Time line." Upon information and belief, the taser is still missing, police left without it.
43. After the funeral, M. Hayes was confronted about the falsified autopsy after the Stamford Advocate told Flynn the autopsy was released. Valerie did not get the autopsy for weeks after it was released (1/15/16).
44. Having viewed the video not recorded by police, Plaintiff Flynn reported the murder/causation and the denial of medical.
45. Shanika Erin, 911 was called for a medical crisis, Shanika has TBI traumatic brain injury. The Police reported multiple that someone has schizophrenia, a mis diagnosis another false statement to the media.
46. Police have taken Stephen Barrier to the Hospital more than 10 times. The call logs have were ordered on December 4, 2019 and denied three times (January 22, 2020).
47. John Nickerson called Valerie at 8:15 on Wed 12/17/19.  
  
Wednesday 12/17/19 it was at 8:39 Channel 12 reported that Stephen died of a congenial heart condition not Police misconduct and psychotic seizure. At 9:10 Channel 12 reported Stephen died from domestic altercation. The Police created a cover story.
48. Valerie heard crying out the window for 30 minutes.

After Taserung Stephen Barrier at the hedge, two offers staged the running incident after Stephen was tasered.



First Plaintiff; John J. Flynn 27 Quintard Ave Norwalk Ct 06854. 203561-0840

Mother Valerie Jaddo

Father Steve Barrier Senior

203-360-9435

Axon Corp Taser International /Isaiah Fields

States attorney Richard Coilangelo 120 Hoyt Street Stamford ct 06901